



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 7, 2023 Application granted. The parties shall file a status update by February 5, 2024. Time is excluded until February 5, 2024, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.

Ronnie Abrams, U.S.D.J.

August 8, 2023

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square,  
New York, NY 10007

**Re: *United States v. Sonny Saratoga, 21 Cr. 560 (RA)***

Dear Judge Abrams:

The Government respectfully submits this letter on behalf of both parties, in response to the Court's February 7, 2023 order (Dkt. No. 25), to provide the Court with a status update on this matter.

As the Court is aware, most recently on February 7, 2023, the Court granted the parties' joint letter adjourning trial in this matter until the defendant's state case pending in Bronx Supreme Court on factually overlapping charges has resolved. (Dkt. No. 25). The Government has been informed by defense counsel that the defendant's state case expects to proceed to trial before the end of this year. Accordingly, the parties respectfully request that the Court set a new date in approximately six months for the parties to provide the Court with an additional status update.

In addition, the Government requests, with the consent of the defendant, by and through defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today until the date that the parties will provide the Court with a new status update. Such an exclusion is in the interest of justice so that the parties can continue discussions regarding a pretrial disposition after the defendant's state case is resolved.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/  
Ni Qian/Michael Herman  
Assistant United States Attorneys  
(212) 637-2364 / -2221